

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 03-
v.	:	DATE FILED:
RAYMOND C. MOHR	:	Violations: 18 U.S.C. § 1341 (Mail fraud - 1 count) 15 U.S.C. § 77q (Securities fraud - 1 count)

INFORMATION

COUNT 1

The United States Attorney charges:

At all times relevant to this Information:

1. From in or about June 1993, until in or about February 1996, defendant RAYMOND C. MOHR was employed as a registered representative at a national broker-dealer in its Philadelphia, Pennsylvania office.
2. From in or about June 1993, until in or about February 1996, defendant RAYMOND C. MOHR acted as an investment advisor and broker for individuals outside his position as a registered representative at the national broker-dealer.
3. In or about February 1996, defendant RAYMOND C. MOHR left the employment of the national broker-dealer and thereafter, until in or about the fall of 2001, represented himself to be an independent investment advisor.

4. From in or about June 1993, until in or about the fall of 2001, defendant

RAYMOND C. MOHR

devised and intended to devise a scheme to defraud and to obtain money by means of false and fraudulent pretenses, representations, and promises.

It was part of the scheme to defraud that:

5. Defendant RAYMOND C. MOHR solicited individuals as clients in his capacity as an individual investment advisor and broker.

6. Defendant RAYMOND C. MOHR represented to investors that he would obtain high returns of as much as 100 to 200 percent for investments which he represented would include equity options and trading in futures contracts.

7. Defendant RAYMOND C. MOHR did not invest funds obtained from investors; rather he used the funds for his own use and to pay investors who requested their investment principle or profits which defendant had falsely told them had been obtained through the alleged investment.

8. Defendant RAYMOND C. MOHR provided fictitious statements of investments and profits to investors, which statements falsely conveyed that particular investments had been made and profits had been achieved.

9. Defendant RAYMOND C. MOHR prevented discovery of his scheme by convincing investors to maintain their purported profits in continuing investments. If investors insisted on receiving the profits or principle of their investments, defendant provided funds which in reality were investment funds obtained from other investors.

10. In the course of the scheme, defendant RAYMOND C. MOHR obtained approximately \$9.6 million from over eighty investors and caused losses to investors of approximately \$3.1 million. MOHR used part of the money obtained for his own expenses.

11. On or about December 18, 2000 in the Eastern District of Pennsylvania and elsewhere, defendant

RAYMOND C. MOHR

having devised and intending to devise the scheme, and for the purpose of executing the scheme and attempting to do so, placed in an authorized depository for mail matter to be delivered by the Postal Service, that is a check in the amount of \$54,519.00 and a cover letter falsely representing that the check reflected profits on an investment, mailed from Wayne, Pennsylvania to investor N.H., in Chalfont, Pennsylvania.

In violation of Title 18, United States Code, Section 1341.

COUNT 2

The United States of America further charges that:

1. The allegations of paragraphs 1 through 3 and 5 through 10 of Count 1 are realleged.

2. From in or about June 1993, until in or about the fall of 2001, in the Eastern District of Pennsylvania and elsewhere, defendant

RAYMOND C. MOHR

knowingly and willfully, by the use of means and instrumentalities of transportation and communication in interstate commerce, and by use of the mails, in the offer and sale of securities, did (1) employ a device, scheme and artifice to defraud; (2) obtain money and property by means of untrue statements of material fact and omissions to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and (3) engage in transactions, practices and courses of business which operate as a fraud and deceit upon the purchaser.

3. On or about December 18, 2000, in furtherance of the scheme to defraud, defendant RAYMOND C. MOHR used the United States mail to transmit a check and false account information from Wayne, Pennsylvania to Chalfont, Pennsylvania.

In violation of Title 15, United States Code, Sections 77q(a) and 77x.

PATRICK L. MEEHAN
United States Attorney